

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

IN RE: AIR CRASH NEAR CLARENCE CENTER,
NEW YORK ON FEBRUARY 12, 2009

09-md-2085

This Document Relates to:
ALL CASES

JOINT STATUS MEMORANDUM

Defendants, Colgan Air, (“Colgan”), Pinnacle Airlines Corp. (“Pinnacle”), Continental Airlines, Inc. (“Continental”), Bombardier Aerospace Corp. and Bombardier Inc. (“Bombardier”), and FlightSafety International Inc. (“FlightSafety”) (collectively “Defendants”), and all Plaintiffs by Plaintiffs’ Liaison Counsel, Hugh M. Russ, III, respectfully submit this Joint Status Memorandum in anticipation of the Status Conference scheduled for October 5, 2011, at 11:30 a.m.

The parties have conferred, and all parties agree that the following issues should be addressed at the Status Conference:

1. Status of settlements/mediations;
2. Status of discovery;
 - a. Depositions
 - b. ESI
 - c. Documents
3. Status of pending motions;
4. Expected motion practice based upon Colgan discovery responses;
5. Possible appointment of special discovery master;

6. Need to redefine Plaintiffs Committee;
7. Resolution of Duplicate Case Filings; and
8. Inspection of wreckage.

The parties are prepared to discuss these issues, as well as any other issues raised by the Court.

Dated: Buffalo, New York
October 3, 2011

Respectfully submitted,

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